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Incoming

C0070005

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From: "Galecki, Gregg" <GGalecki@archcoal.com>
To: Jim Smith <jimdsmith@utah.gov>
CC: "Belcher, Austin" <ABelcher2@archcoal.com>
Date: 12/15/2009 3:53 PM
Subject: RE: Flow monitoring reduction CS-6

Thanks, Jim. I'm glad you agree that the information adequately demonstrates we can stop flow monitoring at CS-6.

However, it doesn't seem to fit anywhere in the MRP. As a quick example, when we modified all the water monitoring south of the Mine site to Field parameters only, with water quality analysis every 5 years - that demonstration is not in the MRP (only the change). Other sites that have been eliminated without a 'detailed' demonstration being in the MRP include CS-1, CS-2, CS-4, CS-5, and CS-15.

I was planning on addressing the lack of flow monitoring at CS-6 with a double asterisk next to the site ID in Table 2.3.7-1, with an accompanying footnote indicating, "Flow monitoring discontinued at CS-6 in 12/2009; See VC-9 for Lower Eccles Creek Flow data". Does that adequately document the change in the MRP?

Can you put these emails in the file for documentation basis?

Gregg A. Galecki
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(435)448-2636

-----Original Message-----

From: Jim Smith [mailto:jimdsmith@utah.gov]
Sent: Tuesday, December 15, 2009 2:34 PM
To: Galecki, Gregg
Subject: RE: Flow monitoring reduction CS-6

>Let me know if this email serves as an adequate demonstration.

Well, yes and no. The information appears satisfactory; however, this information should be in the proposed amendment so that the basis for the Division's finding will not be in a separate document but rather right there in the MRP.

JIM

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